

**SUPPLEMENTAL DISCOVERY REQUEST
WITH RESPECT TO MOTION TO ENLARGE ISSUES**

I. Definitions and Instructions

1. "Person" or "persons" includes natural persons, corporations, partnerships, associations, and other legal entities; and governments or governmental bodies, commissions, boards, agencies, or entities.

2. "Interest" means (a) any form of ownership whether direct or indirect, whether beneficial or legal, and whether actual or contingent, including ownership through a corporation, partnership, association, investment company, bank, or other entity; or (b) any form of office or other position in any business entity.

3. "Document" means the original or any nonidentical copy, regardless of origin or location, of any letter, correspondence, memorandum, telegram, telex, report, record, study, handwritten notes, working paper, bills, receipts, checks, statements, contracts, order, chart, paper, draft, index, tape, disc, data sheet or data processing card, book, pamphlet, or periodical, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, together with any translations, instruction, or other written information necessary to render such material understandable.

4. "Relate to" and "relating to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any way pertinent to the specified subject,

including documents concerning the preparation of other documents.

5. "Or" means "and/or."

6. References to the masculine include references to the feminine.

7. "Principal" includes all persons who hold any portion of any class of stock, partnership interest or other ownership in the applicant, and all officers and directors of the applicant.

8. "Party to the application" is as defined in FCC Form 301.

9. This document request calls for production of all documents within the possession, custody, or control of the applicant, any of its principals, or agents or employees, or any party to its application, or any person under the control of any such party.

10. Each document produced should be identified by the number of the document request to which it is responsive.

11. If any document requested is currently unavailable, explain why it is not currently available.

12. If production of any document called for by this request is refused pursuant to a claim of privilege, the document should be identified by reference to its author, recipient(s), date, and subject matter, and the basis for the privilege claimed for such document should be specified with sufficient precision to permit an assessment of the applicability of the privilege involved.

13. This request is continuing in character, requiring supplemental responses if further or different documents are obtained during or after discovery in this proceeding.

14. "Applicant" refers to Moonbeam, Inc. and/or Mary Constant.

DOCUMENTS REQUESTED

1. All documents relating to Moonbeam's proposed main studio.

2. All documents relating to any involvement or interest of Mary Constant in any past or current broadcast or media-related business of her husband, Fred Constant, within the past 5 years.

3. All documents relating to the Calistoga proceeding referencing Fred Constant or prepared by Fred Constant on behalf of Moonbeam or Mary Constant.

OTHER DISCOVERY

If the requested issue is added, Willson also contemplates deposing Mary Constant and Fred Constant.